

NICHOLAS M. WIECZOREK
Nevada Bar No. 6170
CLARK HILL PLLC
3800 Howard Hughes Parkway, Suite 500
Las Vegas, Nevada 89169
Telephone: (702) 862-8300
Facsimile: (702) 862-8400
nwieczorek@clarkhill.com
Attorneys for Defendant
TELEFLEX

GERALD P. SCHNEEWEIS, CA State Bar No. 101331 (pro hac vice pending)
KYLE A. FELLENZ, CA State Bar No. 285752 (pro hac vice pending)
CLARK HILL PLC
One American Plaza, 600
West Broadway, Suite 500
San Diego, California 92101
Telephone:
Facsimile:
gschneeweis@clarkhill.com
kfellenz@clarkhill.com
Attorneys Schneewies and Fellenz will comply
with LR IA 11-2 within 21 days

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JORDAN J. POTTER

Plaintiff,

V.

ARROWHEAD PRODUCTS, individually and as successor in interest to Arrowhead Rubber Company; CRANE CO.; DCO, LLC; EATON AEROQUIP, LLC; GENERAL DYNAMICS CORPORATION; GENERAL ELECTRIC COMPANY; GOODRICH CORPORATION f/k/a The BF Goodrich Company; HARCOSEMCO LLC f/k/a Harco LLC; HENKEL CORPORATION as successor-in-interest to Loctite Corporation and Dexter Hysol; HEXCEL CORPORATION f/k/a Heath Tecna f/k/a Ciba-Geigy; HONEYWELL INTERNATIONAL, INC., individually and as successor to Alliedsignal, Inc and The Bendix Corporation; IMI INDUSTRIES, INC.; IME INDUSTRIES, INC., individually and as successor in interest to Adel Fasteners;

Case No.: 2:20-cv-00276-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
TELEFLEX INCORPORATED TO
RESPOND TO PLAINTIFF'S
FIRST AMENDED COMPLAINT**

[FIRST REQUEST]

1 INDUSTRIAL MANUFACTURING COMPANY,
2 as successor in interest to Arrowhead Products and
3 Arrowhead Rubber Company; NORTHROP
4 GRUMMAN CORPORATION; OLD ORCHARD
5 INDUSTRIAL CORP., PARKER-HANNIFIN
6 CORPORATION, individually and as successor-
7 in-interest to Cleveland Wheel & Brake and
8 Stratoflex Products; ROGERS CORPORATION;
9 TELEFLEX INCORPORATED; TIGHITCO, INC.
10 as successor-in-interest to H.I. Thompson
11 Company and HITCO; TITEFLEX
12 COMMERCIAL INC; RAYTHEON
13 TECHNOLOGIES CORPORATION f/k/a United
14 Technologies Corporation; WYETH HOLDINGS
15 LLC f/k/a Wyeth Holdings Corp. f/k/a/ American
16 Cyanamid Corporation; DOES 1 through 10,
17 inclusive; and ROE CORPORATIONS 1 through
18 50, inclusive,
19

20 Defendants.
21
22

23 Plaintiff Jordan J. Potter, by and through his counsel of record, Maune Raichle Hartley French
24 & Mudd, LLC and Craig P. Kenney & Associates; and Defendant Teleflex Incorporated, by and
25 through its counsel of record, Clark Hill PLC, hereby stipulate to the following:

26 Plaintiff filed his First Amended Complaint in the above matter on August 26, 2020 and served
27 said Complaint upon Defendant Teleflex Incorporated on September 2, 2020. Defendant's response to
28 the First Amended Complaint is currently due on September 23, 2020. The Defendant Teleflex
Incorporated requested and Plaintiff agreed to stipulate, pursuant to IA Rule 6-1 of the Local Rules for
the United States District Court District of Nevada, to a ten-day extension up through and including
October 5, 2020 for Teleflex to file a response to the First Amended Complaint.

29 The extension for Defendant Teleflex Incorporated to respond to Plaintiff's Complaint is
30 requested due to the fact that Defendant requires additional time to consult with counsel to prepare the
31
32

33

34

35

1 appropriate response to the Plaintiff's First Amended Complaint. In addition, Plaintiff's counsel has
2 been consulted and has agreed to the extension.

3 IT IS SO STIPULATED on this ____ day of September, 2020.

4
5 **MAUNE RAICHLE HARTLEY FRENCH &
MUDD LLC**

CLARK HILL PLLC

6
7 By: /s/ Jackie Olinger Rochelle
T. Barton French, Jr., Nevada Bar No. 5641
8 Jackie Olinger Rochelle
Missouri Bar No. 58557
9 Admitted Pro Hac Vice
10 1015 Locust Street, Suite 1200
St. Louis, MO 63101
11 Phone: (800) 358-5922
jrochelle@mrfmlaw.com
12 Attorneys for Plaintiff

By: /s/ Nicholas M. Wieczorek

Nicholas M. Wieczorek
Nevada Bar No. 6170
CLARK HILL PLLC
3800 Howard Hughes Parkway, Suite 500
Las Vegas, Nevada 89169
Telephone: (702) 862-8300
nwieczorek@clarkhill.com
Attorneys for Defendant TELEFLEX

13 **CRAIG P. KENNY & ASSOCIATES**

14
15 By: /s/ Lawrence E. Mitten
Lawrence E. Mittin
16 Nevada Bar No. 005428
501 S. 8th Street
17 Las Vegas, Nevada 89101
Phone (702) 380-2800
lmitten@cpklaw.com
18 Attorneys for Plaintiff

By: /s/ Gerald P. Schneeweis

Gerald P. Schneeweis,
CA State Bar No. 101331
(pro hac vice pending)
Kyle A. Fellenz
CA State Bar No. 285752
(pro hac vice pending)
CLARK HILL PLC
One American Plaza, 600
West Broadway, Suite 500
San Diego, California 92101
Telephone: (619) 557-0404
Facsimile: (619) 557-0460
gschneeweis@clarkhill.com
kfellenz@clarkhill.com
Attorneys Schneeweis and Fellenz will
comply with LR IA 11-2 within 21 days
Attorneys for Defendant TELEFLEX

24 **ORDER**

25 **IT IS SO ORDERED.**



26
27
28 UNITED STATES DISTRICT JUDGE

DATED: September 22, 2020